

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS -- RENEWAL

PERMITTEE

Sycamore System, L.L.C.
Attn: Mr. Dale Voelz
449 North California Street
Sycamore, Illinois 60178

Application No.: 87090013

I.D. No.: 037055ABE

Applicant's Designation:

Date Received: September 16, 2003

Subject: Sycamore Systems

Date Issued:

Expiration Date:

Location: 449 North California Street, Sycamore

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of:

Wash Tank
Dry Off Oven
Three Electrostatic Paint Spray Booths with Dry Filters
Powder Coat Booth
Bake Oven
Nineteen Natural Gas Fired Heaters
Two Makeup Air Units

pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material (VOM) 100 ton per year, 25 tons per year of combined hazardous air pollutants (HAPs) and 10 tons per year of each individual HAP). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This surface coating operation is subject to a New Source Performance Standard (NSPS) for surface coating of metal furniture, 40 CFR 60, Subparts A and EE. The Illinois EPA is administering NSPS in Illinois on behalf of the United States EPA under a delegation agreement.
- b. At all times the Permittee shall to the extent practicable, maintain and operate the surface coating operation in a manner consistent with good air pollution control practice for minimum emissions.

- c. The Permittee shall fulfill applicable notification and record keeping requirements of the NSPS, 40 CFR 60.7 and 60.315.
3. The Permittee shall only use coatings with less than 0.9 kilograms of volatile organic content per litre of coating solids applied, pursuant to 40 CFR 60.312.
- 4a. Coating usage and clean-up solvent in the three spray booths and associated bake and dry off ovens shall not exceed the following limits:

<u>Three Spray Booths</u>	<u>VOM Usage And Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Coatings & Cleanup Solvents VOM	8.24	98.0

VOM usage and emissions shall be determined on a monthly basis from the amount of each material used and it's VOM and HAP contents minus the amount of material recovered and it's VOM and HAP contents and sent off site. Compliance with the annual VOM emissions limit shall be determined by adding the VOM emissions from the most recent month to the VOM emissions of the preceding eleven months.

- b. This permit is issued based on the VOM content of all coatings as applied being less than 3 lb/gallon, pursuant to 35 Ill. Adm. Code 215.204(g).
- c. This permit is also issued based on negligible emissions of particulate matter (PM), from the powder coating booth. For this reason, emissions shall not exceed nominal rates of 0.1 lb/hour and 0.44 tons/year.
- d. The natural gas usage for Sycamore Systems, including but not limited to: the nineteen gas fired unit heaters, wash tank, dry off oven, bake oven, and two makeup air units, shall not exceed the following limits:

	Natural Gas		VOM		NO _x		CO	
<u>Equipment</u>	<u>(mmcf/Mo)</u>	<u>(mmcf/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Combustion Units	24.7	247	0.07	0.7	1.3	12.4	1.1	10.4

These usage and emission limits are based upon maximum operation of the listed equipment and standard emission factors for natural gas combustion. Compliance with the annual VOM emissions limits shall be determined by adding the VOM emissions from the most recent month to the VOM emissions of the preceding eleven months.

5. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in a rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA.

As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

6. The Permittee shall maintain monthly records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
 - a. Monthly records and twelve month rolling totals shall be kept for each wet coating as applied and each clean-up solvent, including: amount used (gals or liters), solids volume content (gal/gal or liter/liter), volatile organic material (lb/gal or kg/liter), each hazardous air pollutants (lb/gal or kg/liter) and method of application with transfer efficiency (percent) to show compliance with 40 CFR 60 Subpart EE.
 - b. Initially and upon the change of a wet coating, the VOM content shall be determined as applied according to USEPA Reference Method 24 and/or 24A. Alternatively the Permittee may rely on Certified Product Data Sheets.
 - c. VOM and HAP contents of material recovered and shipped offsite (gallons/month and gallons/year).
 - d. Monthly records of amount of material recovered and shipped offsite (gallons/month and gallons/year).
 - e. Monthly records of natural gas usage (million cubic feet).
 - f. VOM and HAP usage and emission calculations (tons/month and tons/year).
7. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

9. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing, or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
5415 North University
Peoria, Illinois 61614

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: VOM and HAP usage and emission calculations (tons/month and tons/year).

Please note that the 32 welding units and the phosphate wash tank are exempt from state permitting requirements, pursuant to 35 Ill. Adm. Code 201.146(y) and (oo), respectively.

If you have any questions on this, please call Randy Solomon at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RBS:psj

cc: Illinois EPA, FOS Region 2
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from manufacture of metal furniture operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The permit limits the amount of volatile organic material used in the three electrostatic spray booths and amount of natural gas combusted to limit emissions of volatile organic material. The resulting maximum emissions are well below the 100 tons per year of volatile organic material (VOM), 25 tons per year of combined HAPs and 10 tons per year of each single HAP, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less paint is used and control measures are more effective than required in this permit.

- 4a. Coating usage and clean-up solvent in the three spray booths and associated bake and dry off ovens shall not exceed the following limits:

<u>Three Spray Booths</u>	<u>VOM Usage And Emissions</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Coatings & Cleanup Solvents VOM	8.24	98.0

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<u>Equipment</u>	<u>Natural Gas</u>		<u>VOM</u>		<u>NO_x</u>		<u>CO</u>	
	<u>(mmcf/Mo)</u>	<u>(mmcf/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>	<u>(T/Mo)</u>	<u>(T/Yr)</u>
Combustion Units	24.7	247	0.07	0.7	1.3	12.4	1.1	10.4

These usage and emission limits are based upon maximum operation of the listed equipment and standard emission factors for natural gas combustion. Compliance with the annual VOM emissions limits shall be determined by adding the VOM emissions from the most recent month to the VOM emissions of the preceding eleven months.

2. As a consequence of the requirements of this permit, the emissions of hazardous air pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from this source will be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs so that HAP emissions do not trigger the requirements to obtain a Clean Air Act Permit Program permit from the Illinois EPA.

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